

1 Charles R. Kozak, Esq.
2 SBN No. 11179
3 Kozak & Associates, LLC
4 3100 Mill St., Suite 115
5 Reno, NV 89502
6 Phone: (775) 322-1239
7 Facsimile: (775) 800-1767
8 chuck@kozaklawfirm.com
9 Attorney for Plaintiff

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EMILA "EMILY" HANNAH THOMAS, an individual,

Plaintiff,

v.

TAREK SALMAN, an individual; TARIQ KAADAN, and individual, DOES 1-50, inclusive,

Defendants.

Case No.: 3:20-CV-00447

REQUEST FOR EXTENSION OF TIME WITHIN WHICH
TO SERVE SUMMONS AND COMPLAINT

COMES NOW, Plaintiff, EMILA "EMILY" HANNAH THOMAS ("Emily") by and through her counsel, CHARLES R. KOZAK, ESQ. of KOZAK & ASSOCIATES, LLC. ATTORNEY NAME AND FIRM, and hereby moves this Honorable Court for an Order extending the time within which to effectuate service of process of the Complaint and Summons filed herein on Defendants, TAREK SALMAN and TARIQ KAADAN.

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1 DATED this 23rd day of September 2020.

2
3 By: /s/ Charles R. Kozak
4 CHARLES R. KOZAK, ESQ.
5 *Attorneys for Plaintiff*

6 **MEMORANDUM OF POINTS AND AUTHORITIES**

7 Plaintiff, by and through her counsel, is seeking leave of this Honorable Court to extend
8 the time within which to effectuate service of process of the Summons and Complaint for 120
9 days on Defendants.

10 In this case, a Complaint was filed in the above-entitled action on July 31, 2020, and a
11 Summons was duly issued to Defendant. Plaintiff was unable to personally serve the Defendants
12 with the Summons and Complaint and therefore filed an Ex Parte Motion for Alternative Service
13 of Summons and Complaint. Said Motion was denied on September 23, 2020, with the Court
14 giving leave to refile and correct.

15
16 As the 120 day time limit for service of the Summons on Defendants will expire on
17 November 28, 2020, Plaintiff is respectfully requesting that this Honorable Court enter an Order
18 allowing Plaintiff an extension of time within which to effectuate service of process of the
19 Summons and Complaint on Defendant for a period of one hundred and twenty days (120) days,
20 considering the complexity of out of country service.

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22 Based upon the rules cited in the Courts Order, dated September 23, 2020, and the reasons
23 more fully set forth in the Affidavit of counsel attached hereto, Plaintiff respectfully requests
24 that her Request for Extension of Time Within Which to Serve Summons and Complaint in the
25 above-entitled action be granted.

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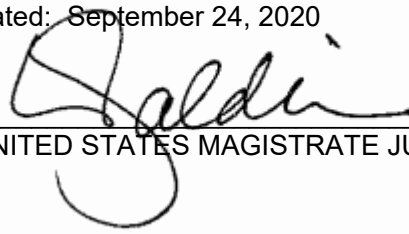
1 Dated this 23rd day of September 2020.

Respectfully submitted

2 By: /s/ Charles R. Kozak, Esq.
3 CHARLES R. KOZAK, ESQ.
4 (SBN No. 11179)
5 KOZAK LAW, LLC
6 3100 Mill St., Suite 115
7 Reno, NV 89502
8 Phone: (775) 322-1239
9 Facsimile: (775) 800-1767
10 chuck@kozaklawfirm.com

11 IT IS SO ORDERED.

12 Dated: September 24, 2020

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14 _____
15 UNITED STATES MAGISTRATE JUDGE
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1 7. Therefore, having shown good faith, your Affiant respectfully requests that an
2 extension of time be granted within which to serve the Defendant for a period of one
3 hundred and twenty days (120) days for the purpose of publication.
4

5 DATED this 23rd day of September 23, 2020.

6 
7 _____
8 CHARLES R. KOZAK

9 SUBSCRIBED and SWORN to before me
10 by Charles R. Kozak, Esq.
11 this 23rd day of September 23, 2020.

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13 _____
14 NOTARY PUBLIC in and for said
15 Washoe County and State of Nevada
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